



ELITE VOYAGE

INFORMATION ON PERSONAL DATA PROCESSING

Dear Club member

In this document, we would like to inform you of how we handle your personal data which you have shared with us in relation to you joining the Elite Voyage Club, and in relation to the services you use provided by or through the company EliteVoyage, s. r. o., with its seat at WeWork - Národní 135/14, 110 00 Prague 1, IČ: 067 44 591 (hereinafter “we” or the “Company”).

Through this document, we are fulfilling our information obligations to you within the meaning of Art. 12, 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter, “GDPR”).

1. Who is the controller of the personal data you have provided, and how can you contact us?

The controller of the personal data you have provided is the company EliteVoyage, s. r. o.

Regarding the processing of your personal data, you can contact us via phone on +420 731 344 444 or via electronic mail at the address contact@elitevoyage.com.

Regarding the processing of the personal data you give us, you can contact us either directly or through a representative you can choose who should show us your written power of attorney.

2. What categories of your personal data do we process?

In regard to you becoming a member of the Elite Voyage Club, we process the following personal data:

- a. your name,
- b. your surname,
- c. your telephone number,
- d. your date of birth,
- e. the address of your permanent residence,
- f. your delivery address,
- g. your e-mail address(es),
- h. your gender,
- i. your signature.

If you use the services within the Elite Voyage programme, in particular if you have signed a package tour contract with us, we generally process the following personal data:

- a. your name,
- b. your surname,



ELITE VOYAGE

- c. the address of your permanent residence,
- d. your nationality,
- e. information about your passport / similar ID, or a copy of such ID,
- f. your date of birth,
- g. your gender,
- h. your telephone number,
- i. your e-mail address(es),
- j. information on your social network account/accounts,
- k. biometric data (in particular weight and height),
- l. information on your religious affiliation (S),
- m. your photograph,
- n. your health status (S),
- o. the IP address associated with you,
- p. cookies,
- q. your signature,
- r. the above listed personal data related to your close associates.

For your information – we have marked sensitive data with the letter “(S)”. We only process sensitive personal data if it is essential for providing a particular service. For further details, we would refer you to Section IX of this information.

3. For what purposes do we process your personal data, and what is the legal basis for processing your personal data?

We mainly process your personal data in order to **fulfil the purpose of the contract relating to your membership of the Elite Voyage Club**, which you signed with us when you joined the Elite Voyage Club, on which basis we are to provide you with basic services (processed in accordance with Art. 6 para. 1 (b) of the GDPR).

Due to the nature of the services we provide, you cannot become a member of the Elite Voyage Club unless we have received at least the following personal data from you:

- a. your name and surname,
- b. the address of your permanent residence,
- c. your date of birth,
- d. information on your gender (if this cannot be determined from your name and surname),
- e. your e-mail address or e-mail addresses,
- f. your address for delivery,
- g. your telephone number,
- h. your signature (biometric data used for your authentication).

If you want our services to be used by **your close associates**, with whom you share parental responsibility, we will also request the following information listed above in points (a) to (d) about your close associates with whom you share parental responsibility.



ELITE VOYAGE

We also process your personal data in order to fulfil the purpose of specific contracts on service provision by the Company, in particular package tour contracts, if you have signed them with us, and on which base we are to provide services to you (processed in accordance with Art.6 para. 1 (b) of the GDPR).

Due to the nature of the travel services we provide, we are unable to provide such travel services to you unless we have received at least the following personal data from you:

- a. your name and surname,
- b. the address of your permanent residence,
- c. your date of birth,
- d. information on your gender,
- e. your telephone number,
- f. your biometric data if you are travelling by air (weight, height),
- g. the number of the document proving your identity (passport, state ID document), data on its validity and country of issuance,
- h. information on your health status in order to arrange travel insurance,
- i. information on allergies and medicines you are taking if this information is essential for providing the agreed services,
- j. your signature (biometric data used for your authentication).

If you also want our services to be used by your close associates, with whom you share parental responsibility, we will also request the above listed information in regard to your close associates.

Due to the nature of the travel services we provide, we also process your personal data in order to protect your vital interests, or the interests of other natural persons. This means we process it in order to use it to arrange travel insurance and if during the course of providing services to you in accordance with our contract on travel services:

- a. there is an air accident or crash in which you are involved,
- b. you are injured or your health deteriorates requiring professional assistance from a doctor/medic,
- c. you are involved in any type of accident, event or natural disaster during which your life or health is affected (endangered),
- d. you become missing during the course of our Company providing you services.

In all the above listed cases, we process your personal data in order to be able to submit it to the bodies investigating the air accident or crash, other accident, event or natural disaster, or to those providing you with assistance due to your life or health being in danger, or in relation to organising a search party to find you. In this case, the purpose of processing your personal data is in order to ensure the maximum protection of your life and health, or your property (processed in accordance with Art. 6 para. 1 (d) of the GDPR).

We also process your personal data for the purposes of the legitimate interests of our Company. We define these legitimate interests as (a) protection of our rights derived from the signed contract if these are breached by you, and (b) if you make any claims in relation to the signed contract against us. We also process your personal data in order to use them in any judicial and debt collection enforcement of our claims and rights if you breach the contract, and for our legal defence in the event you make any claim in relation to the signed contract (processed in accordance with Art. 6 para. 1 (f) of the GDPR). Since by becoming a member of the Elite Voyage Club, you sign a contract on the provision of services,



ELITE VOYAGE

your e-mail address will also be used for direct marketing purposes, so that we can inform you of new services you may be interested in, discounts or other special offers. Direct marketing also involves profiling you so that the Company can offer you discounts or other benefits which correspond as closely as possible to your customer profile. In this regard, we would like to inform you that in accordance with Art. 21 of the GDPR you have the right to object to the processing of your personal data for purposes of our legitimate interests as we have described them above. You can lodge your objection by e-mail at the address contact@elitevoyage.com. If you object to the use of your e-mail address for direct marketing purposes, your e-mail address will no longer be used for such purposes. Nevertheless, we hereby inform you that this may negatively affect the quality of the services we provide to you.

In this regard, we would like to inform you that in accordance with Art. 21 of the GDPR you have the right to object to the processing of your personal data for purposes of our legitimate interests as we have described them above.

You can request a list of Company partners who are able to contact you with a marketing offer from the Company by sending a message to contact@elitevoyage.com.

4. Who is the recipient of your personal data?

The primary recipient of your personal data is our Company.

Due to the nature of the services we shall be providing you with in accordance with our contract, we shall also provide your personal data to the necessary extent to:

- a. transport providers (airline companies or other carriers),
- b. accommodation providers (a hotel or other provider of accommodation services),
- c. the insurance company with whom we arrange travel insurance for you,
- d. providers of other services agreed in the contract signed with our Company,
- e. state and administration bodies investigating air accidents or crashes where such an event occurs,
- f. state and administration bodies for the purposes of protecting your vital interests (see Section III above),
- g. medical facilities, doctors, ambulance workers or similar providing you treatment and/or protecting your life,
- h. legal representatives of our Company in order to recover debts and/or protect our rights in the event that you breach our contract and/or in our defence against any claims you bring against us,
- i. subjects involved in and/or mandated to recover outstanding debts,
- j. state and administration bodies if they ask us to provide data in relation to such bodies exercising their responsibilities,
- k. business partners for the purpose of marketing offers

5. Will your personal data be transferred abroad?

Your personal data will not be transferred abroad unless we provide services to you whose nature requires us to do so, in particular travel services on the basis of a package tour contract. In such cases, your personal data will be transferred to other European Union member states and to third countries (i.e. countries outside the European Union).

If we transfer your personal data to third countries, we shall do so on the basis of a contract signed with the recipient of your personal data, which will include a standard contractual clause in the form required by European Union regulations. We shall always transfer personal data only to the extent that is strictly necessary.



ELITE VOYAGE

6. How long will we process your personal data for?

In regard to personal data which you have given your consent to be processed (where this has occurred), as such data is described in your consent, this data will be processed for the period for which your consent was given, at most however for the period of your membership of the Elite Voyage Club. You can contact us at the e-mail address contact@elitevoyage.com for information on what period your consent to the processing of your personal data has been given.

In regard to personal data which we process on the basis of the relevant provisions arising from the GDPR (see Section III above), this will be processed for the period necessary in order to provide the services agreed, for the period necessary to demonstrate the provision of services in accordance with the accounting and taxation regulations of the relevant Czech Republic bodies, and for the period necessary to protect our rights in the event that you breach the contract, and in all cases for at least the limitation period in regard to any claims, whether yours or our Company's, arising from the signed contract, or in accordance with the signed contract. The limitation period is detailed in the Civil Code (Act no. 89/2012 Coll.).

7. In what way will we be processing your personal data? How will we protect your personal data?

Your personal data will be processed in electronic form within the Company's electronic system, or within the electronic system of the body to whom your personal data is transferred.

Your personal data will also be processed in the form of a physical document (a document on paper or similar physical medium) which will be stored in the Company's filing cabinets.

We assure you that we have implemented measures to ensure your personal data is always fully protected against its misuse or loss.

All persons within our Company who come into contact with your personal data have been trained and authorised for that purpose. Our paper document archive is secured against entry by unauthorised persons. The archive is secured with locks and other physical protection safeguards. Electronically processed personal data is stored in a secure database.

8. What are your rights in regard to the process of your personal data?

We here inform you of your rights in regard to the processing of your personal data:

- a. If you have given your consent to the processing of your personal data through formal consent, you have the right to **withdraw your consent**. You can withdraw your consent by sending a written notification by post to the address of our seat (see section A above) or electronically to contact@elitevoyage.com. In your notice of withdrawal, you should state your identification in the form of your name, surname, date of birth and the address of your permanent residence. All you need to state in your withdrawal is: "I withdraw the consent I gave to the company EliteVoyage, s.r.o. to process my personal data."

In regard to **withdrawing your consent** to the processing of your personal data, we hereby inform you that **the Company remains entitled to process your personal data if the purpose of such processing is based on another reason given in the GDPR than your consent**.

We also hereby inform you that **if you withdraw your consent, the lawfulness of processing your personal data arising from the consent you have given is not affected in any way**.

As such, even after the withdrawal of your consent, the processing of your personal data by us during the period your consent applied will continue to be considered lawful.



ELITE VOYAGE

- b. You have the right to request access to your personal data to the extent given in Art. 15 of the GDPR.
- c. You have the right to rectification of the personal data provided in accordance with Art. 16 of the GDPR.
- d. You have the right to request erasure of your personal data in accordance with Art. 17 of the GDPR.
- e. You have the right to request restriction of processing of your personal data in accordance with Art. 18 of the GDPR.
- f. You have the right to portability of your personal data to another controller in accordance with Art. 20 of the GDPR, i.e. you can ask us to transfer your personal data to another controller.
- g. You have the right to lodge a complaint against us as the controller of your personal data with a supervisory authority, in this case the Office for Personal Data Protection (<https://www.uoou.cz>) (Art. 77 of the GDPR).

If you decide to utilise any of the above detailed rights, we are obliged to identify you, i.e. verify that the person asking to exercise such rights is the person our processing of personal data relates to.

9. Do you process my sensitive personal data?

In regard to sensitive personal data, we process this data **only if you have provided it to us and/or if you have published it**, or if its processing is **necessary to protect your vital interests** or such interests of other natural persons. On our part, we have listed the rules of processing sensitive personal data in section C above.

In other cases, we only process such sensitive personal data if you have **given your consent** to its processing.

In this regard, we hereby inform you that in some countries sensitive personal data, such as religious affiliation, may be requested in order to allow entrance to such countries. Information on your health (weight, height, mobility) may be requested, such as for some types of air transport. Information on your health is essential in order to arrange travel insurance. Information on allergies and medicines you may use are necessary when arranging food services. If this information is not provided, we will not be able to secure you the appropriate service. In situations where the above detailed sensitive data is essential in order for us to provide services, you will be expressly informed of this fact when you arrange the contract with us, and if you do not provide us with the detailed sensitive personal data the relevant contract cannot be concluded.

10. Is the provision of your personal data an essential requirement in order to conclude a contract with a travel agency?

As we stated in section III above, if you do not provide the data described in section III, we cannot provide our services to you due to the nature of the Company's activities and due to the type of services arranged in the contract. This data is essential in order to conclude a contract with us (identification of contractual parties, identification of persons to whom the service should be provided, provision of services), and without its provision a contract cannot be concluded.

In section IX above, we informed you that in some cases sensitive personal data may be requested by us, and if this is not provided we will be unable to secure services for you. For details, we refer you to section IX above.

11. What does processing of personal data involve?

Processing personal data involves any kind of operation or set of operations on your personal data or set of personal data, whether this be applied mechanically or through automated processes. Processing includes collecting, recording, ordering, structuring, storing, adjusting or changing, searching, inspecting, using, disclosure by transmission, propagation or any other disclosure, arranging or combining, limiting, deleting or destroying personal data.



ELITE VOYAGE

12. Further information

If we change the purpose for processing your personal data, we will inform you of such in advance.

If anything within this information is unclear to you, we are ready to answer your queries.
You can contact us at any time at contact@elitevoyage.com or at +420 731 344 444.

If we change this information, we will inform you of the change.

This information is available in physical or electronic form at our Company's seat,
and in electronic form at our website www.elitevoyage.com.

Thank you for the attention you have paid to this information.